

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

Ameren Transmission Company of Illinois	}	
	}	
Petition for a Certificate of Public Convenience	}	
and Necessity, pursuant to Section 8-406.1 of	}	
the Illinois Public Utilities Act, and an Order	}	
pursuant to Section 8-503 of the Public Utilities	}	Case No.: 12-0598
Act, to Construct, Operate and Maintain a New	}	
High Voltage Electric Service Line and Related	}	
Facilities in the Counties of Adams, Brown, Cass,	}	
Champaign, Christian, Clark, Coles, Edgar,	}	
Fulton, Macon, Montgomery, Morgan, Moultrie,	}	
Pike, Sangamon, Schuyler, Scott, and Shelby,	}	
Illinois.	}	

**DIRECT TESTIMONY ON REHEARING  
  
OF  
  
RUSTIN GODFREY**

**Intervenor MSSCLPG Exhibit 8.0**

1                    **DIRECT TESTIMONY ON REHEARING OF RUSTIN GODFREY**

2            **Q.     PLEASE STATE YOUR NAME AND CURRENT RESIDENTIAL ADDRESS.**

3            A.     Rustin A. Godfrey. 61 Modesto Road, Waverly, Illinois 62692.

4            **Q.     HOW LONG HAVE YOU LIVED AT THAT ADDRESS?**

5            A.     I have lived at that address for a little more than eighteen years.

6            **Q.     WHAT IS LOCATED AT THAT ADDRESS?**

7            A.     I have approximately three acres, plus a single family home, where I live with my wife and  
8                   daughter.

9            **Q.     ARE YOU FAMILIAR WITH THE PROCEEDING IN WHICH YOU ARE**  
10           **SUBMITTING THIS TESTIMONY?**

11          A.     Yes, I am. I became very familiar with this proceeding after an order was entered on August  
12                   20, 2013, approving a route that would take the new 345 kV line within approximately 100  
13                   feet of my home.

14          **Q.     DID YOU HAVE ANY KNOWLEDGE OF THE PROPOSED 345 kV LINE PRIOR**  
15           **TO THE ORDER OF AUGUST 20, 2013?**

16          A.     Yes, I did. I believe I first heard of it sometime in the late summer or early fall of 2012.  
17                   Someone mentioned to me that there was a meeting in Chatham, Illinois on the very  
18                   afternoon that I heard about the meeting, so I attempted to go to the meeting but arrived late.  
19                   I just got in on the tail end of the meeting. Mention was made that there would be a meeting  
20                   later that same day in Farmersville, Illinois. I was able to go to the full meeting in  
21                   Farmersville.

22          **Q.     AS A RESULT OF ATTENDING THESE MEETINGS, WHAT DID YOU LEARN?**

23 A. I learned that a primary route was being proposed by ATXI which would have no effect on  
24 my property. I knew that an alternate route was also proposed but this did not seem like a  
25 real possibility at the time and I therefore did not think it was necessary to take any action  
26 and unfortunately I did not.

27 **Q. WHY ARE YOU TAKING THE TIME AND EFFORT TO PRESENT TESTIMONY?**

28 A. For at least two reasons. First, the routing option known as the Rebuttal Recommended  
29 Route would have an immediate and dramatic impact upon my family home and how my  
30 wife and daughter live in the future. Also, I have studied this matter and I believe that there  
31 is a very viable alternate option which would have much less impact upon everyone. That  
32 viable alternate route would utilize an existing 138 kV line corridor and has come to be  
33 known in this proceeding as the MSCLTF Route.

34 **Q. PLEASE DESCRIBE YOUR PERSONAL SITUATION WITH THE IMPACT UPON**  
35 **YOUR RESIDENCE.**

36 A. As I stated above, my wife, daughter, and I live at 61 Modesto Road, Waverly. This is a  
37 house I have owned for eighteen years. It is located on three acres. My family is very happy  
38 with the location. Quite frankly, although it is a house we have enjoyed for many years, we  
39 have studied the matter and weighed our options, i.e., a sizable addition or newly constructed  
40 home and finally in April 2012 we decided it would be most cost effective to simply build  
41 a new house on the same land within ten to fifteen feet of our existing house and then tear  
42 down the existing house and continue to utilize the same land because we like the location.  
43 This was cost effective. This is what we decided to do. After making this decision, and  
44 while starting to firm up our plans, we became aware of the possibility, but certainly not the

probability, that a 345 kV line could be constructed approximately 100 feet from our home. Therefore we put construction on hold. There are also six homes within two miles of my own that would be equally affected by the Rebuttal Recommended Route.

**Q. AT THIS POINT IN TIME, ARE YOU PLANNING TO PROCEED WITH THE CONSTRUCTION OF THE NEW HOME?**

A. We would like to proceed but we are certainly not going to proceed while this case is pending. If the Illinois Commerce Commission approves the MSCLTF Route, we will definitely move ahead with the new home. However, if a 345 kV line is constructed approximately 100 feet from the existing home, we will certainly not proceed. It would make no economic sense to do so. We are taking no action until we see what happens in this case.

**Q. WHY WOULD YOU CHOOSE NOT TO PROCEED WITH CONSTRUCTION OF THE NEW HOME IF APPROVAL IS GIVEN TO THE REBUTTAL RECOMMENDED ROUTE?**

A. There are lots of reasons, not the least of which being that large transmission lines such as the one proposed simply are unattractive and noisy. I also believe but cannot prove that there are health hazards created by living near such high voltage lines. I certainly believe that if the line in question is installed approximately 100 feet from my home, or even at a greater distance, the value of my property will be greatly diminished. Not only will my enjoyment of my property be diminished, but I reasonably believe my ability to sell the property will be diminished as well.

**Q. WHAT IS YOUR BUSINESS OR OCCUPATION?**

A. I operate an insurance agency known as Godfrey Insurance Agency which is located in

Chatham, Illinois. Although we are a general agency, 95% plus of my business involves crop insurance. The majority of my customers are farmers located within approximately a sixty mile radius of Springfield.

**Q. DO YOU HAVE ANY CUSTOMERS WHO WOULD BE AFFECTED BY THE PROPOSED REBUTTAL RECOMMENDED ROUTE?**

A. Yes. I have a number of customers in Sangamon and Morgan Counties who would be affected. Since the order was entered on August 20, 2013, a number of people have called me as to this proposed transmission line going along the Rebuttal Recommended Route.

**Q. WHAT DO YOU BELIEVE WOULD BE THE PROPER OUTCOME OF THIS CASE?**

A. I believe the least cost option is to build the new line along the same corridor as the existing 138 kV line, as is proposed by the MSCLTF Route. This would create an option that is approximately 18 miles shorter than the Rebuttal Recommended Route. I am also informed that the MSCLTF Route would have initial construction costs more than \$36 million less than the initial construction costs of the Rebuttal Recommended Route. I believe these are matters that should be given serious consideration by the Illinois Commerce Commission.

**Q. ARE YOU FAMILIAR WITH THE EXISTING 138 kV LINE?**

A. Yes, I am.

**Q. ARE YOU FAMILIAR WITH THE PROPOSED 345 kV LINE?**

A. Yes, I am.

**Q. HOW DID YOU GAIN THIS FAMILIARITY?**

A. As mentioned above, I sell crop insurance. I spend the vast majority of my time outside the

89 office driving between various farms located within a sixty mile radius of Springfield. I have  
90 approximately 250 customers who I service and see regularly. In addition, I am constantly  
91 out calling upon potential new customers. My existing and potential customers are located  
92 throughout the area which includes both the existing 138 kV line and the area upon and  
93 across which the Rebuttal Recommended Route would be constructed. It is my business to  
94 know this area, where the farmers live, etc. Together with other members of the MSSCLPG,  
95 we have prepared a map using Google Earth. We then utilized the map in question and  
96 actually drove along both the existing 138 kV line and also along the Rebuttal Recommended  
97 Route.

98 **Q. WITH REFERENCE TO WHAT HAS BEEN MARKED AS INTERVENOR**  
99 **MSSCLPG EXHIBIT 11.1, ARE YOU FAMILIAR WITH THIS DOCUMENT AND,**  
100 **IF SO, CAN YOU DESCRIBE THE SAME?**

101 A. Yes, I am and I can. This is map of the area in question that I just described. I believe this  
102 truly represents the area in question. As stated above, I drive through this area, if not on a  
103 daily basis, at least on a weekly basis. These maps, to the best of my knowledge, accurately  
104 depict both the existing 138 kV corridor and the Rebuttal Recommended Route. The maps  
105 also indicate and show other structures that exist along and upon the existing 138 kV corridor  
106 and the Rebuttal Recommended Route.

107 **Q. WHAT CONCLUSIONS DO YOU DRAW FROM THE MAP INCLUDED IN**  
108 **INTERVENOR MSSCLPG EXHIBIT 11.1?**

109 A. The map, along with my personal experience, indicate to me that in the immediate vicinity  
110 of the 138 kV line, there are far fewer homes and other structures than are located along the

Rebuttal Recommended Route.

**Q. IS THERE ANYTHING ELSE YOU WOULD LIKE TO ADD?**

A. Yes. As mentioned above, I sell crop insurance. Part of this insurance coverage can be for wind damage to farm crops. I have absolutely no trouble selling this type of insurance to farmers located along the southern segment of the Rebuttal Recommended Route near Route 104. I have personally observed that transmission lines along Route 104 have gone down at least twice in the last five to ten years. The insurance companies that I represent have paid claims for wind damage to crops in this same area along Route 104 where the southern portion of the Rebuttal Recommended Route would be constructed.

**Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

A. Yes, it does.